



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

November 1, 2010

Steve Storo
BLM Prineville District Office
3050 N.E. 3rd Street
Prineville, Oregon 97754

RE: EPA Region 10 Comments on the West Butte Wind Power Right of Way Draft
Environmental Impact Statement (EPA Project #10-003-BLM)

Dear Mr. Storo:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the West Butte Wind Power Right of Way (ROW) in Crook and Deschutes counties. Our review has been conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

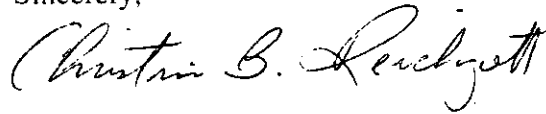
The preferred alternative identified in the FEIS is Alternative 1. This alternative includes the granting of a 3.9-mile-long right of way (ROW) for construction and operation of an access road and transmission line across lands administered by the BLM. Connected actions analyzed in the FEIS include the construction and operation of a wind farm (West Butte Wind Power) and its attendant facilities on privately held lands (access road, transmission line, substation, and an operations and maintenance building).

In our May 2010 comments on the draft EIS, EPA indicated concern over the adequacy of the impact analysis for golden eagles, and recommended recommend that West Butte Wind and the BLM work with the Wildlife Mitigation and Monitoring Technical Advisory Committee to determine whether additional monitoring and analysis should be undertaken relative to raptor use of the site. We appreciate the additional information that has been incorporated into the FEIS related to raptor interactions with the proposed project, and the expanded mitigation discussion. We continue to register some concern over the fact that a number of identified mitigation measures are likely to remain unfunded (DEIS p. ES-12). We also recognize, however, that per IM 2010-156¹, an Avian Protection Plan (APP) will be prepared, and that the record of decision will only be issued if the US Fish and Wildlife Service (USFWS) concurs with BLM on the adequacy of the APP. As such, we encourage BLM to continue to work in close coordination with the TAC and USFWS as the APP is finalized.

¹http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2010/IM_2010-156.html

EPA appreciates the opportunity to comment on the FEIS. If you have any questions regarding EPA's comments, please contact Teresa Kubo of my staff at (503) 326-2859.

Sincerely,

A handwritten signature in cursive script that reads "Christine B. Reichgott".

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

